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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

SR-6J

December 12, 2001

Maisha Hamilton-Bennett, Ph.D.  
Quality Behavioral Care, Inc.  
915 East Hyde Park Blvd.  
Chicago, Illinois 60615

Re: Parks College Property  
Cahokia, Illinois

Dear Dr. Hamilton-Bennett:

I am writing in response to your November 30, 2001, letter regarding the Dead Creek environmental clean up project as it relates to the Parks College property located in Cahokia, Illinois. My response to your letter is based upon the facts presently known to the U.S. EPA and is provided solely for informational purposes.

In response to growing concern over health and environmental risks posed by hazardous waste sites, Congress passed the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) and established the Superfund program to clean up these sites. The Superfund program is implemented by U.S. EPA in cooperation with individual states and local and tribal governments. Sites are discovered by citizens, businesses, and local, state and federal agencies. After a potential hazardous waste site is reported to U.S. EPA, the site-specific information is recorded in the Superfund database, the Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS). Sites are added to CERCLIS when U.S. EPA believes there may be contamination that warrants action under Superfund.

U.S. EPA initially screens a potential hazardous waste site to determine what type of action, if any, is necessary. The Superfund program may then perform a preliminary assessment and site investigation to determine whether contamination at a property is likely to require a federal cleanup response, an evaluation to determine if a short term response action to

eliminate or reduce contamination is needed, and add the site to U.S. EPA's list of high priority hazardous waste sites known as the National Priorities List (NPL).

The U.S. EPA is addressing the property referenced above in connection with the Sauget Area 1 site under the authority of CERCLA. Dead Creek, which is part of the Sauget Area 1 Superfund site, runs through the former Parks College Property. Dead Creek is the only area of concern related to the Sauget Area 1 site which directly impacts the former Parks College Property.

Dead Creek was actively used as a waste disposal area for industrial and municipal wastes between the 1920's into the early 1980's. Dead Creek is approximately 3.5 miles long and flows southward through Sauget and Cahokia and empties into the Old Prairie du Pont Creek, which flows approximately 2,000 feet west into a branch of the Mississippi River known as the Cahokia Chute. For sampling purposes, Dead Creek was subdivided into six separate segments labeled creek segment (CS)-A through CS-F. Dead Creek CS-E runs through the former Parks College property and extends approximately 4,300 feet from Jerome Lane to the intersection of Illinois Route 3 and Route 157. Land use surrounding CS-E is predominantly commercial with some mixed residential use.

Sediment and surface water samples collected by U.S. EPA and the Illinois Environmental Protection Agency (Illinois EPA) in CS-E have detected elevated concentrations of VOCs and SVOCs in sediment samples including chlorobenzene (120 ppb), pyrene (5,300 ppb), benzo(b)fluoranthene (2,400 ppb), and chrysene (2,800 ppb). Elevated levels of PCBs (total) were also detected at a maximum concentration of 59,926 ppb. Elevated levels of metals were also detected in the sediments of CS-E including cadmium (23.1 ppm), copper (8,540 ppm), lead (1,270 ppm), mercury (1.53 ppm), nickel (2,130 ppm), and zinc (9,970 ppm).


On information and belief, parties which generated wastes which were disposed of, released into and/or transported wastes to CS-E (including parties whose wastes migrated from various disposal areas into other Sites or segments of Dead Creek) include but are not limited to the following: Monsanto Company/Solutia, Incorporated; Cerro Copper Products Company; Mobil Oil Company; Amax Zinc Corporation; Midwest Rubber reclaiming (Division of Empire Chemical Incorporated) and Midwest Rubber Trustees Stanley Keitman, Richard M. Cohen, and Morris Weissman; Ruan Transportation Corporation; Rogers Cartage Co.; Sterling Steel Casting Co.; Darling Fertilizer; and Waggoner & Company; Industrial Disposal, Inc.; Sauget and Company; and Paul Sauget.

A Unilateral Administrative Order (UAO) was issued to Solutia, Inc. by the U.S. EPA on May 31, 2000, requiring among other things the removal of affected creek bed sediments and soils and flood plain soils from specific sections of Dead Creek including CS-E. Sediment removal activities conducted pursuant to the UAO have been completed for CS-E. Post removal samples will be taken throughout Dead Creek when all Dead Creek sediment removal activities are completed in approximately 8 weeks. Results from the post removal sampling will not be available for several months after collection. These post removal samples will be used to determine what, if any, excavated areas may require further remediation. U.S. EPA is hopeful that no further remedial action will be necessary for CS-E, however, a final determination can not be made until the post removal sampling results are available.


U.S. EPA has received numerous requests for covenants not to sue from prospective purchasers of contaminated property due to the clear liability which attaches to landowners who acquire property with knowledge of contamination. It is the Agency's policy not to become involved in private real estate transactions. However, an agreement with a covenant not to sue a prospective purchaser might appropriately be considered if it will have substantial benefits for the government and if the prospective purchaser satisfies other criteria. U.S. EPA currently does not have enough information available to determine whether a prospective purchaser agreement is necessary or would apply to your situation. I, however, have enclosed a copy of the guidance for your own review and determination of its applicability to you.

U.S. EPA hopes that the above information is useful to you. Further, we direct your attention to the Information Repository for the Sauget Area 1 Site located at the Cahokia library. If you have any questions, or wish to discuss this letter, please feel free to contact me at (312) 886-4592.

Sincerely,

  
Mike Ribordy  
Remedial Project Manager  
Superfund Division

Enclosure

cc: Thomas Martin, EPA w/o enclosure  
Bruce Sypniewski, EPA, w/o enclosure  
Sandra Bron, IEPA 

bcc: Mike Ribordy, EPA, w/o enclosure